IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

PATTIVA McKEAN, * C.A. No.: 06-526***

Plaintiff,

*

VS

*

NORFOLK SOUTHERN RAILWAY COMPANY, a Virginia corporation,

*

Defendant.

NOTICE OF DEPOSITION OF DEFENDANT EMPLOYEES

PLEASE TAKE NOTICE that Plaintiff Pattiva McKean will take the deposition upon oral examination of the following named employees of Defendant Norfolk Southern Railway Company pursuant to Federal Rule of Civil Procedure 30, before an authorized court reporter, commencing at 11:00 a.m. on August 2, 2007 at the offices of Schmittinger & Rodriguez, P.A., located at 414 South State Street, Dover, Delaware 19903-0497, or at such other time and place as agreed to by the parties. The deposition will continue from day to day until completed, shall be transcribed, and may be videotaped. Witnesses to be deposed are: E.T. Downes, Jr.; L.D. Lafferty; Tim Knox; and Steven M. Scruggs.

SCHMITTINGER & RODRIGUEZ, P.A.

RV -

NICHOLAS H. RODRÍGUEZ, ESQ.

Bar I.D. #356

414 South State Street

P.O. Box 497

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Attorney for Plaintiff

DATED: 7-23-07